

J-W POWER COMPANY
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Gas Compression Services

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February 11, 2011

U.S. EPA
Director, Air RCRA, and Toxics Division
901 N 5th Street
Kansas City, KS 66101

REC'D
FEB 15 2011
APCO

Dear Administrator:

J-W Power Company leases natural gas compression packages to various entities in your jurisdiction. These packages are powered by stationary RICE burning natural gas. With the passage of the NESHAP revision for SI RICE last year, initial notifications are required on engines over 500 horsepower at area sources. The requirement to submit these initial notifications, like all of the requirements of the rule, is for the Owner and Operator. In the case of leased compression, there is not a clear distinction between who is Owner and Operator. Therefore, J-W Power Company is submitting these notifications as Owner for all of the affected RICE in our fleet. It is probable that our customers who operate the sources will also submit notifications.

Notes Regarding Required Data

- Address of Owner and Operator: The address for J-W Power Company is listed above.
- Physical location of the affected source: The county and state is provided in Attachment A, below. Oil and Gas locations do not typically have a physical address. In the case of RICE that are idle and located at one of our storage yards, that address is provided. Attachment A also lists the Operator of the Source and the name the Operator has designated for the source. More information regarding the physical location can be obtained via the Operator.
- Relevant Standard is 40 CFR Part 63 Subpart ZZZZ
- Brief description of the nature, size, design and method of operations of the source: Appendix A lists the horsepower rating, engine manufacturer and model of the RICE. All of these RICE are Spark Ignited (SI) engines that burn natural gas.
- HAP's emitted: 96% of the emitted HAP's are represented by Formaldehyde, Acetaldehyde, Acrolein, Methanol, Benzene and 1,3 Butadiene with Formaldehyde being the largest at 60-70% of the total HAP's. The remaining 4% of HAP's are listed in Attachment B
- Status of Source (Major or Area): J-W Power Company has no way of accurately determining whether each source is an "Area Source of HAP's" or a "Major Source of HAP's" because there are often other emissions facilities at the source that are beyond our control and knowledge. The sources reported herein are most likely Area Sources but the Operator of the source would have to make that determination. If they are located at a Major Source, then you should already have received notice prior to this time.

If I can be of further assistance, please advise.

Sincerely,



John Dutton

Manager of Operations, J-W Power Company

APPENDIX "A"

Record #	Operator	Lease name or address	County	State	Horsepower	Engine Manufacturer	Eng Model
100	NOBLE ENGY:YUMA	JONES SITE	DUNDY	NE	1340	CATERPILLAR	G3516 TALE/AFR ARR# 273-3063

Attachment B
HAP's contained in exhaust of natural gas fired RICE
(List obtained from AP-42)

Major Constituents (makes up approximately 96% of the HAP's in the Exhaust):

- Formaldehyde
- Acetaldehyde
- Acrolein
- Methanol
- Benzene
- 1,3 Butadiene

Minor Constituents (makes up approximately 4% of the HAP's in the Exhaust):

- 1,1,2,2 Tetrachloromethane
- 1,1,2 Trichloromethane
- 1,3 Dichloropropene
- 2 Methylnapthalene
- 2,2,4 Trimethylpentane
- Acenaphthene
- Acenaphthylene
- Benzo(b)fluoranthene
- Benzo(e)pyrene
- Benzo(g,h,i)perylene
- Biphenyl
- Carbon Tetrachloride
- Chlorobenzene
- Chloroform
- Chrysene
- Ethylbenzene
- Ethylene Dibromide
- Fluoranthene
- Fluorene
- Methylene Chloride
- N-Hexane
- Napthalene
- AH
- Phenanthrene
- Phenol
- Pyrene
- Styrene
- Tetrachloroethane
- Toluene
- Vinyl Chloride
- Xylene